

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,

Plaintiff and Defendant-in-Counterclaim,

v.

JOSHUA ABRAMS a/k/a
ACCOUNTABILITY FOR ALL,

Defendant,

KATE PETER a/k/a MASSHOLE
TROLL MAFIA,

Defendant and Plaintiff-in-Counterclaim.

CASE NO. 1:22-cv-11421-ADB

AFFIDAVIT OF KATE PETER

I, Kate Peter, under oath depose and state as follows based upon my personal knowledge:

1. I am one of the Defendants in the above-captioned matter. I am employed full-time as a residential property manager and have been for 6 years. I live at home with my two children, aged 16 and 13. I am their full-time caregiver and sole provider. In my spare time, I also run a YouTube channel, presently called “Masshole Troll Mafia.”

2. The plaintiff in this matter, Jose Maria DeCastro (“Mr. DeCastro”), is a content creator that runs a YouTube channel called “Delete Lawz.”

3. On October 29, 2022, Mr. DeCastro posted a four-hour YouTube video in which

he explained the many ways in which he intended to “go after” a third-party witness in this case.¹

A small sampling of Mr. DeCastro’s outrageous comments directed at Mr. Lyon, some of which threaten physical violence, follows:

- “He’s going to go down. I’ll send you his info, these people are so lucky that we’re not in a third-world country, they don’t get it, they don’t understand. They were built for being a keyboard Warrior I was built for the actual war.”
<https://youtu.be/NcPvPvfKKI8?t=3763>
- “hahaha, liar, let’s see how you do when I publish the video on Monday. And then I just remind him that I’m gonna send, uh, I’m gonna put a picture of his face out online. I sent him a clip of the video because I want him to understand that he needs to work with me, and not work with these disgusting Troll mafias.” “I can make an example out of you, I’m going to track you down.” <https://youtu.be/NcPvPvfKKI8?t=8868> (2:27:48 -2:32:04)
- “[Y]ou might want to think about your identity being leaked you might want to think about how you can be creative and work with me it’s the only way or I’ll just publish your identity and we’ll figure out who you are, pretty bold.”
<https://youtu.be/NcPvPvfKKI8?t=9100> (2:31:41 - 2:32:05)
- “**This is going to get you fired**, and I really don’t want to, if this is going to get you fired I really don’t want to do this. I told him this over a month ago. a month ago. **just give me an affidavit and work with me, and I don’t want to publish any of this**, he has continued to bullshit me and showed up for court in with Kate and just wait, he’s going to send me hand-picked troll receipts here in a second wait till you see this.”
<https://youtu.be/NcPvPvfKKI8?t=10120> (2:48:32-2:52:27) (emphases supplied)
- “Wake up, Todd, this is over. You don’t have to be the collateral damage, and I only want her [*i.e.*, Ms. Peter] and Josh [Abrams, the co-defendant in this case]. I just need the proof. I don’t want to go at you, not my fun, but that’s the problem we have you walk away from this, they go down from this text chain.”
<https://youtu.be/NcPvPvfKKI8?t=11070> (3:04:30 - 3:05:02)

4. On November 12, 2022, I published a live stream video entitled, “Let’s Celebrate! Ask Me Anything”. In the “thumbnail” image for the video, a photograph of a man whom I now know is named Mark Adams was used, without any context provided in the image, video title, or

¹ For the background on the relationship between Messrs. Lyon and DeCastro, Ms. Peter respectfully refers the Court to the affidavits Mr. Lyon filed in support of motions she previously filed with this Court. *See* ECF Nos. 37, 41.

video contents. Seeing as Mr. Adams has filed no appearance in this case, nor does he appear to be an attorney, and I had never had any contact with Mr. Adams whatsoever, at the time I published the video, I was not under the impression that he was a member of Mr. DeCastro's "legal team." I did not know that he was in anyway affiliated with Mr. DeCastro.

5. My understanding at the time was simply that Mr. Adams had been entering group conference calls within my Discord server to take clandestine recordings, and I opted to give him a little nod as a joke through my video thumbnail. At no time in the November 12, 2022 video was Mr. Adams identified, "doxed," mentioned, or discussed, again, because I did not know who he was. In fact, Mr. Adams' identity would have remained out of the public sphere, if not for Mr. DeCastro's naming him in the Motion for Contempt, ECF No. 61, and identifying him as the individual in the photo.

6. On November 13, 2022, I published a live stream video entitled "What To Do If You Get Doxxed – Chille Is A Quarter of a Man." Although I will admit that this was perhaps a lapse in judgement given the pending litigation, at no time during my monologue in the video did I make any true threats or use fighting words against Mr. DeCastro. My statements were not arbitrary nor unprovoked. On the contrary, they were a direct reaction to several days in a row of Mr. DeCastro repeatedly posting videos and social media posts on YouTube vowing to explicitly "dox" anyone who supports or views my content, and lacing those statements with threats, including, but not limited to:

- Vowing to obtain addresses of my supporters through the court process and sending "people" to their homes to harass them;
- Vowing to obtain my supporters' employment information with the intent to contact employers and "get [them] fired;"
- Vowing to "go after [their] families, children, brothers, sisters, mothers, friends;" and

- Threatening to send “Colombians” to my supporter’s homes, which I infer to mean the cartel or another South American criminal organization. Mr. DeCastro used the fact that he was traveling in Colombia at the time to add credence to his threat.

7. For these reasons, the November 13th video was not an attack on Mr. DeCastro on its face. Instead, and in response to Mr. DeCastro’s “doxing” threats, I provided instructions in the video on how to properly respond to the “doxing” if and when Mr. DeCastro is able to act on his expressed plan. In the course of this, I did express to my audience, albeit in a vulgar and confrontational fashion, that Mr. DeCastro’s actions were carried out with the sole intent to intimidate and undermine, and that overreacting to his constant attempts to gain leverage over me, and the Internet at large, provides him, in my opinion, with an undeserved sense of power and control. Furthermore, during the stream’s “live” broadcast, Mr. DeCastro was present in the “comments section,” antagonizing me further and continuing to issue threats to which I responded.

8. On November 13, 2022, Mr. DeCastro posted a public live stream YouTube video entitled “Wanna Play Ruff I like Ruff,” which he has now set to “private.”²

9. In his November 13, 2022 video, Mr. DeCastro reiterates his desire to use this litigation to destroy me and my online presence. He specifically says:

“Kate, I'm taking you down, baby. I'm taking down your Discord account, and you know what? You're not gonna be able to pay me, Kate. I'm gonna get equitable relief. I'm gonna get you kicked off the internet. I swear to God, Kate Peter, I won't stop till I take you off the internet. Oh, she's, because she's a woman, because she's a woman. No. Because she's, a, just because she's a terrible person. Because she's a terrible person.” (23:59 – 24:20).

² Mr. DeCastro’s November 13th video was originally accessible via a link which is now private: <https://www.youtube.com/watch?v=tw3zHLi12iw>. I have saved a backup copy of this video here: <https://www.youtube.com/watch?v=EwqZArtuMfw>.

10. In that same November 13th video, Mr. DeCastro openly threatens to dox and or harass third parties, whom he believes have some connection to me. In particular, he states, among other things:

“You are in my head. I can’t wait to dox the next person tomorrow. And tomorrow is a big troll. Tomorrow is a big troll, tomorrow we dox someone, we put their information out, I put the, I’m putting everything. Your parents don’t get away. Your family doesn’t get away. Nobody gets away. I dox everything about you; your address, your job, your phone number. Everything. I put everything out there. I just don’t put it on YouTube, because, you know why? I don’t want to get in trouble, but I’m putting all your information out there on the back channels.” (39:39 – 40:09)

“And I’m gonna put a picture up of their house. I’m gonna put a picture up of their full, everything about them. I’m gonna dox them entirely. And by the way, I’m not just doxing here, I’m doxing you on the back channels, too. On every back channel I have, I’m sending your information off to everybody I have. You guys want to play? Let’s Play. I’m on vacation, I got plenty of time right now.” (49:37-49:59)

11. The Discord server is an open forum with 2,800 users that is not under my direction, nor my control, outside of enforcing basic rules.

12. The posted rules in the Discord server are as follows:

“By being in this server, you are agreeing to the following rules:

1. Do not harass other users. Brigading, repeated badgering, or prolonged personal attacks based on race, color, religious creed, national origin, ancestry, sex, gender identity, age, and dehumanizing attacks will not be tolerated.
2. No sharing of other users’ private, personal information. This includes: Full name, birthdate, address, phone number, workplace, family members, and identifiable photographs. If you self-disclose any information listed, you understand you are doing so at your own risk. This is a public, open server.
3. No slurs of any kind will be tolerated. i.e. “N word, f-got word”, etc.
4. If someone is bothering you, you have a block button and should use it before complaining to mods [*i.e.*, moderators].

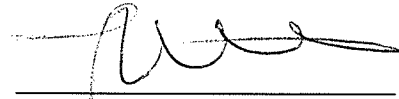
5. If you're under 18 years old, get the f--- out of here. You will be banned immediately.
6. No child pornography. You will be reported to Discord and the appropriate authorities and be lifetime banned immediately.
7. No gore: photos or videos depicting animal abuse or death, child abuse, graphic violence, or death. Doing so will result in an immediate ban.
8. No photos of children, no discussing other people's children. It's f----- weird.

First offense: sent to the timeout room for 24 hours so you can sit and think about what you've done. Second offense: sent to the timeout room for 24 hours so no one has to deal with you. Third offense: Banned for 6 months. Repeat bans will result in a permanent ban at the moderators' collective discretion."

13. Any speech contained within the Discord server that abides by the rules is allowed and unmoderated. I did not write any of the Discord comments that Mr. DeCastro has highlighted for the Court, nor did I direct any of my followers and/or supporters to make those comments on my behalf or otherwise. None of the statements on the Discord server that Mr. DeCastro has highlighted for the Court, again, none of which I had a part in, violated any of the aforementioned server rules. In particular, the brief discussion surrounding "Discussing Law" did not break any of the rules because "Discussing Law" is a public YouTube channel that is therefore open for public discussion. In addition, making an (off color) joke about being "da bomb" also did not break the rules.

14. Despite the Court's order requiring that parties communicate through counsel, Mr. DeCastro has continued to reach out to me directly, apparently refusing to include my attorney on the communications. For example, in a November 20, 2022 email, Mr. DeCastro threatened me with litigation in multiple states unless I submit to his demands. I not including that email as an attachment to my Affidavit out of an abundance of caution as Mr. DeCastro appears to have styled it as a settlement communication.

Signed under the penalties of perjury, this 28 day of November, 2022.

A handwritten signature in black ink, appearing to read 'Kate Peter', written over a horizontal line.

Kate Peter